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June 20, 2023

VIA ECF

Hon. Vernon S. Broderick
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litigation*, Case No.
1:14-md-02542-VSB
Joint Letter Regarding Proposed Candidates for Special Master

Dear Judge Broderick:

I represent Plaintiffs TreeHouse Foods, Inc., Bay Valley Foods, LLC, and Sturm Foods, Inc., and I write on behalf of all Plaintiffs and Defendant Keurig Green Mountain, Inc. (the “Parties”) to submit proposed candidates for a special master in the event one is appointed, per this Court’s June 13, 2023 Opinion & Order (the “June 13 Order”). ECF No. 2061, at 18, 20.

The Parties met and conferred as required by the June 13 Order. While the Parties agreed that the Honorable Barbara S. Jones (ret.) was acceptable for purposes of adjudicating the outstanding motions to seal described in the June 13 Order, the Parties contacted Judge Jones following their meet and confer, and Her Honor advised that she does not have the time to take on a new project for at least the next few months. Consequently, we do not believe that Judge Jones is a realistic alternative for this project.

As for the list of three alternative candidates required by the June 13 Order, the Parties provide the following proposed candidates, in alphabetical order, who would be acceptable to the Parties in the event a special master is appointed:

- Hon. James “Jay” C. Francis IV (Ret.), <https://www.jamsadr.com/francis/>
- Hon. Steven Gold (Ret.), <https://www.jamsadr.com/gold/>
- Hon. Richard Holwell (Ret.), <https://www.hsgllp.com/attorneys-Richard-Holwell>

The Parties have not inquired of the availability of the above alternative candidates but would be happy to do so at the Court’s request. The Parties thank the Court for its attention and consideration.

Respectfully submitted,

By: /s/ Aldo Badini
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*Counsel for Plaintiffs TreeHouse
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LLC, and Sturm Foods, Inc.*

cc: Counsel for All Parties (via ECF)